

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

SPARTAN BUSINESS SOLUTIONS LLC
D/B/A SPARTAN CAPITAL,

Case No. 6:23-cv-06258-FPG

Plaintiffs,

-against-

MARQUIS CATTLE COMPANY INC.
D/B/A MARQUIS CATTLE COMPANY;
MONTANA MOUNTAIN BISON, INC.;
MCC TRUCKING LLC;
M HANGING 6 RANCH LLC D/B/ A PUMP'T;
MARQUIS CATTLE INC. and
CORY SHANNON MARQUIS,

NOTICE OF MOTION

Defendants.

PLEASE TAKE NOTICE that upon the Declaration of Steven W. Wells, Esq., dated June 9, 2023, with exhibits attached thereto, and the accompanying Memorandum of Law, dated June 9, 2023, Plaintiff Spartan Business Solutions LLC d/b/a Spartan Capital ("Plaintiff"), shall make an application pursuant to 28 U.S.C §§ 1332, 1441, 1446, and 1447, and 9 U.S.C. § 1, *et seq.*, for an order to remand or, in the alternative, to compel arbitration against Defendants Marquis Cattle Company Inc. d/b/a Marquis Cattle Company, Montana Mountain Bison, Inc., MCC Trucking LLC, M Hanging 6 Ranch LLC d/b/a Pump't, Marquis Cattle Inc., and Cory Shannon Marquis ("Defendants"), and for such other and further relief as the Court deems just and proper.

Dated: Lancaster, New York
June 9, 2023

Respectfully submitted,

WELLS LAW P.C.

By: /s/Steven W. Wells
Steven W. Wells
229 Warner Road
Lancaster, New York 14086
Tel.: (716) 983-4750
Email: steve@wellspc.com

Counsel for Plaintiff